

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

T. ROWE PRICE TAX-FREE HIGH YIELD
FUND, INC., SMITH BARNEY INCOME
FUNDS/SMITH BARNEY MUNICIPAL HIGH
INCOME FUND, DRYDEN NATIONAL
MUNICIPALS FUND, INC., LOIS AND JOHN
MOORE AND ACA FINANCIAL GUARANTY
CORP.

Plaintiffs,

v.

KAREN M. SUGHRUE, GARRY L. CRAGO,
JEAN W. CHILDS, PAULA EDWARDS
COCHRAN, G. STEVENS DAVIS, JR., JULIA B.
DEMOSS, WILLIAM R. DILL, LESLIE A.
FERLAZZO, JOYCE SHAFFER FLEMING, ERIC
W. HAYDEN, CATHERINE CHAPIN
KOBACKER, ANNE MARCUS, CELESTE REID,
RICHARD J. SHEEHAN, JR., JOSEPH SHORT,
GREGORY E. THOMAS, SUSAN K. TURBEN,
DONALD W. KISZKA *and* ADVEST, INC.,

Defendants.

Civil Action No. 04-11667 RGS

**ASSENTED TO MOTION TO ENLARGE TIME TO RESPOND TO MOTIONS TO
DISMISS**

Plaintiffs T. Rowe Price Tax-Free High Yield Fund, Inc., Smith Barney Income Funds/Smith Barney Municipal High Income Fund, Dryden National Municipals Fund, Inc., ACA Financial Guaranty Corp. and Lois and John Moore (collectively, "Plaintiffs") move to enlarge the time for filing responses to the motions to dismiss their Amended Complaint until Monday, May 2, 2005. All Defendants have assented to this motion. In support of their motion, Plaintiffs further state:

1. This securities fraud action arises out of Bradford College's default on a MIFA bond issuance. Because these bonds were issued by a Massachusetts political entity for the benefit of a private institution, the case raises complex issues under both the federal and Massachusetts securities laws. Additionally, plaintiffs have brought claims under chapter 93A and Massachusetts common law counts.

2. All defendants have moved to dismiss on several grounds. Defendants have filed memoranda in excess of 100 pages in support of their motions and raise numerous issues. Substantial effort will be necessary to respond properly to Defendants' motions.

3. Due to the effort necessary to respond, Plaintiffs' attorneys' commitments in other cases and pre-existing vacation schedules, Plaintiffs need two months to respond properly to the motions. Accordingly, Plaintiffs' request that the time for their filing a response be enlarged until Monday, May 2, 2005. Counsel for all Defendants' have assented to this enlargement.

4. Enlargement of time to respond will not unduly delay resolution of this case. The Court has not issued a scheduling order in this action nor will the requested enlargement interfere with any other deadlines established for this action.

WHEREFORE, for the reasons set forth above, Plaintiffs request that the time for responding to Defendants' motions to dismiss be enlarged until May 2, 2005.

By their attorneys,

/s/ Michael Tabb

Thomas Hoffman, Esq., BBO# 237320

Michael Tabb, Esq. BBO # 491310

Greene & Hoffman, P.C.

125 Summer Street, Suite 1420

Boston, MA 02110

(617) 261-0040

Dated: March 11, 2005